

CGB-CC-1134

# Blum DD, LLC

Kevin Campbell  
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Kevin@KevinCampbellFilms.com

Received & Inspected

JUL 15 2011

FCC Mail Room

Date: June 28, 2011

Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
Attn: CGB Room 3-B431  
445 12<sup>th</sup> St. SW  
Washington, DC 20554

RE: Blum DD, LLC's Petition for Exemption from FCC's Closed Captioning Requirements

Dear Secretary:

I am writing to request that you exempt Blum DD, LLC, the producers of the television show "Jeane Dole: Design Detective," from the FCC Closed Captioning Requirements. I believe that these Requirements will create an undue financial burden upon our company. Please consider the following facts:

- Blum DD, LLC has created the show "Jeane Dole: Design Detective" for the Denver market targeting a limited audience of those people interested in interior design.
- The program will air during Paid Programming and is intended only as a test to see if there is an audience for this content.
- Blum DD, LLC is in its first year of existence and our start-up costs have been high; we have yet to recoup any of our investment.
- Blum DD, LLC's production costs per episode are \$8,300; our revenue is currently \$1200 per episode for a loss of -\$7,100 per episode.
- The cost to provide Closed Captioning for each episode is \$275.
- This will increase our loss per episode to -\$7,375, which would cause an additional undue financial burden upon our startup company.
- The other option to provide Closed Captioning is to purchase the necessary equipment to insert CC ourselves.
- The cost of purchasing the necessary equipment to provide CC would be almost \$5,000.
- The cost per show for transcription would be \$100 per episode.
- This is simply not a viable option for Blum DD, LLC, since we do not have the revenue to support the cost of said equipment.

I believe the evidence above demonstrates that the cost of providing Closed Captioning for each episode would create an undue financial burden on Blum DD, LLC, and I ask that our company be exempt from the FCC Closed Captioning Requirements.

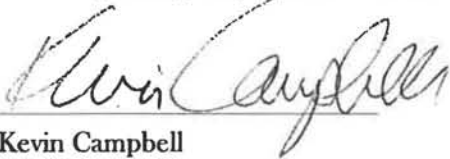
Sincerely,

Kevin Campbell  
Producer, Blum DD, LLC

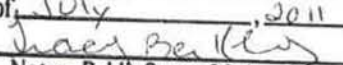
## AFFIDAVIT OF KEVIN CAMPBELL

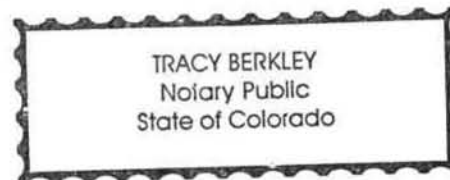
Kevin Campbell  
Blum DD, LLC  
2875 S. Tejon St.  
Englewood, CO 80110

I, Kevin Campbell, affirm that the evidence in the document named "Blum DD, LLC's Petition for Exemption from FCC's Closed Captioning Requirements" is the truth.

  
Kevin Campbell

7/5/11  
Date

The foregoing instrument was acknowledged  
before me in the County of Arapahoe,  
State of Colorado, this 5th  
day of July, 2011.  
  
Notary Public State of Colorado



Commission expires  
July 18, 2014